1 2 3 4 5 6 7 8	QUINN EMANUEL URQUHART & SULLIVA Charles K. Verhoeven (Bar No. 170151) charlesverhoeven@quinnemanuel.com David A. Perlson (Bar No. 209502) davidperlson@quinnemanuel.com Melissa Baily (Bar No. 237649) melissabaily@quinnemanuel.com John Neukom (Bar No. 275887) johnneukom@quinnemanuel.com Jordan Jaffe (Bar No. 254886) jordanjaffe@quinnemanuel.com 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Facsimile: (415) 875-6700	AN, LLP	
9	Attorneys for WAYMO LLC		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION		
12	WAYMO LLC,	CASE NO. 3:17-cv-00939-WHA	
13	Plaintiff,	DECLARATION OF LINDSAY COOPER	
14 15	vs. UBER TECHNOLOGIES, INC.;	IN SUPPORT OF PLAINTIFF WAYMO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL ITS MOTION IN	
16	OTTOMOTTO LLC; OTTO TRUCKING	LIMINE NO. 17	
17	Defendants.		
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01980-00104/9549878.1		CASE No. 3:17-cv-00939-WF	

CASE No. 3:17-cv-00939-WHA

COOPER DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO SEAL

I, Lindsay Cooper, declare as follows:

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1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo's Administrative Motion to File Under Seal information in its September 16, 2017 Motion in Limine No. 17 and exhibits in support of the same (the "Administrative Motion" or "Waymo's Motion"), as well as Defendants' Response to the same and exhibits in support of the same. The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo's Motion in Limine No. 17 ("Waymo's Motion")	Portions highlighted in green; portions highlighted in blue	Waymo; Defendants
Exhibit 1 to Waymo's Motion	Entire Document	Waymo and/or Defendants
Exhibit 2 to Waymo's Motion	Entire Document	Waymo and/or Defendants
Exhibit 3 to Waymo's Motion	Portions highlighted in green; portions highlighted in blue	Waymo; Defendants
Portions of Uber's Opposition to Waymo's Motion in Limine No. 17 ("Uber's Opposition")	Portions highlighted in blue	Defendants
Exhibit 50 of Uber's Opposition	Entire Document	Waymo and/or Defendants
Exhibit 52 of Uber's Opposition	Entire Document	Waymo and/or Defendants

3. Waymo seeks to seal the portions of Waymo's Motion in Limine No. 17, Exhibits 1-3, Defendants' Opposition and Exhibits 50 and 52 because Defendants have designated the information confidential and/or highly confidential. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.

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4. The Court should seal the portions of Waymo's Motion in Limine No. 17, Exhibits 1-3, and Defendants' Exhibits 50 and 52 because they contain or refers to Waymo's asserted trade secrets, which Waymo seeks to seal. I understand that this information is maintained as secret by Waymo (Dkt. 25-47) and is valuable as trade secret to Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors access to in-depth descriptions—and analysis—of the functionality of Waymo's autonomous vehicle system. The public disclosure of this information would give Waymo's competitors access to Waymo's own indepth analysis of its business, and if such information were made public, I understand that Waymo's competitive standing would be significantly harmed. Waymo's request to seal is narrowly tailored to only the confidential information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on September 13, 2017.

By /s/ Lindsay Cooper
Lindsay Cooper
Attorneys for WAYMO LLC

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SIGNATURE ATTESTATION Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper. /s/ Charles K. Verhoeven Charles K. Verhoeven

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